

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KLEEN PRODUCTS LLC, <i>et al.</i> ,)	
)	
Plaintiffs,)	Case No. 1:10-cv-05711
)	
v.)	Hon. Milton I. Shadur
)	
PACKAGING CORPORATION OF)	Hon. Nan R. Nolan
AMERICA, <i>et al.</i> ,)	
)	
Defendants.)	
)	

DECLARATION OF NATHAN P. EIMER

I, Nathan P. Eimer, pursuant to 28 U.S.C. § 1746, declare:

1. I am an attorney duly licensed by the State of Illinois. I am co-counsel for International Paper in the above-captioned action. I provide this Declaration in support of Defendants' Opposition to Plaintiffs' Motion to Preclude Defendants' Expert Witness From Testifying About Defendants' Testing and Validation Processes and to Preclude Exhibit From Being Admitted Into Evidence. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify under oath.

2. Attached hereto as Exhibit A is a true and correct copy of the March 21, 2012 letter from Britt M. Miller, on behalf of Defendant Temple Inland, to Daniel Mogin, responding to Mr. Mogin's March 6, 2012 letter to all Defendants.

3. Attached hereto as Exhibit B is a true and correct copy of the March 21, 2012 letter from Joanne Lee, on behalf of Defendant International Paper Company, to Daniel Mogin, responding to Mr. Mogin's March 6, 2012 letter to all Defendants.

4. Attached hereto as Exhibit C is a true and correct copy of the March 21, 2012 letter from Scott M. Mendel, on behalf of Cascades Canada ULC and Norampac Holdings

U.S., Inc., to Daniel Mogin, responding to Mr. Mogin's March 6, 2012 letter to all Defendants.

5. Attached hereto as Exhibit D is a true and correct copy of the March 21, 2012 letter from Leonid Feller, on behalf of Packaging Corporation of America, to Daniel Mogin, responding to Mr. Mogin's March 6, 2012 letter to all Defendants.

6. Attached hereto as Exhibit E is a true and correct copy of the March 21, 2012 letter from R. Mark McCareins, on behalf of RockTenn CP, LLC (f/k/a Smurfit-Stone Container Corporation), to Daniel Mogin, responding to Mr. Mogin's March 6, 2012 letter to all Defendants.

7. Attached hereto as Exhibit F is a true and correct copy of the March 21, 2012 letter from Rachel V. Lewis, on behalf of Weyerhaeuser Company, to Daniel Mogin, responding to Mr. Mogin's March 6, 2012 letter to all Defendants.

8. Attached hereto as Exhibit G is a true and correct copy of the March 21, 2012 letter from Stephen R. Neuwirth, on behalf of Georgia-Pacific LLC, to Daniel Mogin, responding to Mr. Mogin's March 6, 2012 letter to all Defendants.

9. Attached hereto as Exhibit H is a true and correct copy of the February 15, 2012 letter from Michael J. Freed to Nathan P. Eimer.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 27, 2012 in Chicago, Illinois.

Respectfully submitted,

/s/ Nathan P. Eimer

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Counsel for INTERNATIONAL PAPER
COMPANY, *and for purposes of this
submission only, on behalf of Defendants*
PACKAGING CORPORATION OF
AMERICA; CASCADES CANADA, INC.;
INTERNATIONAL PAPER COMPANY;
NORAMPAC HOLDINGS U.S. INC.;
WEYERHAEUSER COMPANY; GEORGIA
PACIFIC LLC; TEMPLE-INLAND INC.; and
ROCKTENN CP, LLC